

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ROBERTO ORTIZ,

Plaintiff,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC., TRANSUNION
LLC, and AMERICAN HONDA
FINANCE CORPORATION,**

Defendants.

Misc. Action No. _____

**(Case No. 1:19-cv-22601-DPG
pending in the United States District
Court for the Southern District of
Florida, Miami Division)**

**LEXISNEXIS RISK SOLUTIONS INC.’S MOTION TO QUASH
PLAINTIFF’S THIRD-PARTY SUBPOENA**

LexisNexis Risk Solutions Inc. (“LNRS”), by counsel, moves to quash the Subpoena to Testify at a Videoconference Deposition in a Civil Action, dated July 8, 2020, (the “Subpoena”) issued by Roberto Ortiz to LNRS in Case No. 1:19-cv-22601-DPG (S.D. Fla.). The reasons in support of the motion are set forth in the accompanying memorandum in support, which is incorporated herein by reference.

WHEREFORE, LexisNexis Risk Solutions Inc. respectfully requests that the Court: (1) grant its Motion to Quash; and (2) quash Plaintiff’s Subpoena.

Dated: July 27, 2020

LEXISNEXIS RISK SOLUTIONS INC.

/s/ Cindy D. Hanson
Cindy D. Hanson
Georgia Bar No. 323920
TROUTMAN SANDERS LLP
600 Peachtree Street NE, Suite 3000
Atlanta, Georgia 30308
Telephone: (404) 885-3000
Facsimile: (404) 885-3900
Email: cindy.hanson@troutman.com

Counsel for LexisNexis Risk Solutions Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of July 2020, I filed the foregoing pleading electronically using the Court's ECF system and also served a copy via electronic and regular U.S. mail on the following counsel of record:

Joey D Gonzalez Ramos
Joey Gonzalez, Attorney, P.A.
P.O. Box 145073
Coral Gables, FL 33114
Telephone: (305) 720-3114
Facsimile: (305) 676-8998
Email: joey@joeygonzalezlaw.com

Leo Bueno
Leo Bueno, Attorney, PLLC
P.O. Box 141679
Coral Gables, FL 33114
Telephone: (305) 669-5260
Email: leo@buenolaw.com

Attorneys for Plaintiff

Michael Alexander Maugans
Jones Day
600 Brickell Avenue
Brickell World Plaza
Suite 3300
Miami, FL 33131
Telephone: (305) 714-9769
Facsimile: (305) 7140-9799
Email: mmaugans@jonesday.com

Christina Therese Mastrucci
Jones Day

600 Brickell Avenue
Brickell World Plaza
Suite 3300
Miami, FL 33131
Telephone: (305) 714-9700
Facsimile: (305) 714-9699
Email: cmastrucci@jonesday.com

Genna Leigh Sinel
Jones Day
600 Brickell Avenue
Brickell World Plaza
Suite 3300
Miami, FL 33131
Telephone: (305) 714-9764
Email: gsinel@jonesday.com

Attorneys for Defendant Experian Information Solutions, Inc.

Andrew Garrett Tuttle
Fowler White Burnett PA
Northridge Centre
515 N. Flager Drive
Suite 2100
West Palm Beach, FL 33401
Telephone: (561) 727-2677
Fax: (561) 802-9976
Email: atuttle@fowler-white.com

Amanda Loughmiller
Quilling, Selander, Lownds, Winslett & Moser, P.C.
6900 N. Dallas Parkway, Suite 800
Plano, TX 75024
Telephone: (214) 560-5455
Email: aloughmiller@qslwm.com

Attorneys for Defendant TransUnion LLC

Christopher Brent Wardrop
Quintairos, Prieto, Wood & Boyer, PA
10902 Crabapple Road
Roswell, GA 30075
Telephone: (770) 650-8737
Email: brent.wardrop@qpwblaw.com

Attorney for Defendant Honda Finance Corporation

/s/ Cindy D. Hanson
Cindy D. Hanson
Georgia Bar No. 323920
TROUTMAN SANDERS LLP
600 Peachtree Street NE, Suite 3000
Atlanta, Georgia 30308
Telephone: (404) 885-3000
Facsimile: (404) 885-3900
Email: cindy.hanson@troutman.com

Counsel for LexisNexis Risk Solutions Inc.